



MONO COUNTY HEALTH DEPARTMENT

Environmental Health

221 TWIN LAKES ROAD, P.O. BOX 476, BRIDGEPORT, CALIFORNIA 93517
(760) 932-5588 • FAX (760) 932-5284 • canacker@mono.ca.gov

Deficiencies and Corrective Actions

Update 1 submitted: November 21, 2006

Update 2 submitted: March 22, 2007

Update 3 submitted: July 3, 2007

1. **Deficiency:** The CUPA did not complete or submit the FY 04/05 Annual Summary Reports.

CUPA Corrective Action: CUPA submitted FY 05/06 Summary Reports to Cal/EPA.

Cal/EPA Response: Deficiency has been corrected.

2. **Deficiency:** The CUPA did not complete their FY 04/05 annual Self-Audit Report.

CUPA Corrective Action: Deficiency has been corrected. Submitted 11/21/06.

3. **Deficiency:** The CUPA is not fully regulating all the agricultural handlers in the County. Although a few of the handlers have been captured and regulated, many are not being regulated.

CUPA Corrective Action (Update 1): The CUPA plans to coordinate with the County Agricultural Commissioner to identify agricultural handlers during fiscal year 2006-2007 (see Mono County Health Department CUPA Self-Audit July 1, 2005 to June 30, 2006 under the heading, "Hazardous Materials Business Plan").

CUPA Corrective Action (Update 2): On March 22, 2007, the CUPA contacted the County Agricultural Commissioner to discuss the best way to identify agricultural handlers in Mono County. The County Agricultural Commissioner agreed to prepare an inventory list of agricultural handlers then mail it to the CUPA. Once the CUPA receives the inventory list, it will contact agricultural handlers either by mail, telephone or in person to determine if and at what extent these handlers will be incorporated into Mono County's Unified Program.

CUPA Corrective Action (Update 3): Mono County Environmental Health has received the County Agricultural Commissioner's inventory of 24 agricultural businesses located throughout Mono County. A determination has been made to contact these businesses and require Hazardous Materials Business Plans (HMP). A "DRAFT" HMP notice has been prepared by Mono County Environmental Health CUPA. After consultation with the Office of Emergency Services (scheduled for July 9) concerning agricultural (farm) exemptions and after management review, the "DRAFT" notice will be finalized then mailed to the agricultural businesses, no later than July 16, 2007.

Cal/EPA response: Cal/EPA is satisfied with the progress Mono County is making towards correcting this deficiency. Cal/EPA will continue to monitor the progress. In the next update, please let Cal/EPA know how many farms responded to the letter that Mono County is planning on sending out shortly.



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D R A F T

July 2007

ATTENTION AGRICULTURAL HANDLERS

REGULATION OF AGRICULTURAL HANDLERS UNDER THE HAZARDOUS MATERIALS BUSINESS PLAN PROGRAM

California Health and Safety Code Section 25500 requires Hazardous Materials Business Plans (HMP) for all businesses having hazardous materials (in reportable quantities) and hazardous waste (in any quantity). Generally, businesses operating as farms or “agricultural handlers,” are subject to the same level of regulation as other businesses that handle hazardous materials and generate hazardous wastes. We have information that indicates your business is a farm and may therefore be subject to the HMP requirement.

An HMP is a document containing detailed information on the hazardous materials and hazardous waste at your business; emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material; and training for employees.

An HMP is a written set of procedures and information created to help minimize the effects and extent of a release or threatened release of a hazardous material. The intent of the HMP is to satisfy federal and state Community Right-To-Know laws and to provide detailed information for use by emergency responders.

If your business has a hazardous material or mixture containing a hazardous material with a quantity at any one time during the reporting year equal to or greater than: 55 gallons, 500 pounds, or 200 cubic feet at standard temperature and pressure for a compressed gas, then you must prepare and implement an HMP.

Examples of some common reportable hazardous materials at agricultural sites include:

- Fertilizers (liquid and dry)
- Herbicides
- Diesel and fuel tanks
- Pesticides
- Lubricating oil
- Propane for heating greenhouses or chickens

Enclosure 1 is an Hazardous Materials Plan packet that contains all of the necessary forms you will need to prepare your businesses' HMP. Enclosure 2 is an instruction and information booklet that provides you with instructions and guidelines for properly completing your forms and assistance in determining which forms you must complete.

One copy of your completed HMP must be maintained at your business and one copy mailed to my attention at: Mono County Environmental Health, P.O. Box 476, Bridgeport, CA 93517.

Certified Unified Program Agency (CUPA) Fees

The HMP Program is one program element of the CUPA Program, which is regulated by this office as the Certified Unified Program Agency (CUPA) for Mono County. Fees have been established for the issuance of permits for and/or the inspection of CUPA facilities in Mono County. Annually, you will be invoiced HMP Program fees, based on the total reportable quantities of hazardous substances and/or hazardous waste handled at your business.

If you have any questions or need help in completing your HMP, please call me at (760) 932-5588 to request an appointment for further consultation or assistance.

Sincerely,

Carol Anacker-Hubbard
Environmental Scientist

Enclosures (2)